

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A BRAZOS
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.

Defendant.

Civil Action No: 6:20-cv-00902-ADA

JURY TRIAL DEMANDED

**JUNIPER NETWORKS, INC.'S UNOPPOSED MOTION TO WITHDRAW
DECLARATION OF JOSEPH E. REED IN SUPPORT OF JUNIPER NETWORKS,
INC.'S REPLY IN SUPPORT OF ITS OPPOSED MOTION TO TRANSFER VENUE TO
THE NORTHERN DISTRICT OF CALIFORNIA (Dkt. 58)**

Juniper Networks, Inc. (“Juniper” or “Defendant”) respectfully files this Motion to Withdraw Declaration of Joseph E. Reed in Support of Juniper Networks, Inc.’s Reply in Support of Its Opposed Motion to Transfer Venue to the Northern District of California (Dkt. 58 filed May 24, 2021) and requests that the Court withdraw the entire docket 58.

Defendant intended to file, as docket 58, the Declaration of Joseph E. Reed, and intended to link that declaration to docket 57, which is the Reply in Support of Its Opposed Motion to Transfer Venue to the Northern District of California (“Reply”) and Exhibit A, which were filed under seal. Instead of attaching the Declaration of Joseph E. Reed as docket 58, Defendant inadvertently refiled the Reply and Exhibit A as docket 58, this time not under seal. To correct this error, Defendant now seeks to withdraw what was incorrectly filed unsealed as docket 58 and then replace it with the Declaration of Joseph E. Reed, which will be filed unsealed and linked to docket 57.

This request as unopposed.

PRAYER

Defendant requests the Court withdraw Declaration of Joseph E. Reed in Support of Juniper Networks, Inc.’s Reply in Support of Its Opposed Motion to Transfer Venue to the Northern District of California (Dkt. 58) as the Reply in Support of Its Opposed Motion to Transfer Venue to the Northern District of California and Exhibit A is already filed under seal under docket 57. Defendant further requests any and all relief to which is shows itself entitled.

DATED: May 26, 2021

Respectfully submitted,

By /s/ B. Russell Horton

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Counsel for Defendant

Juniper Networks, Inc.

CERTIFICATE OF CONFERENCE

I certify that on the May 26, 2021, I spoke to Timothy J. Rousseau, Counsel for Plaintiff WSOU Investments LLC and they do not oppose this motion.

/s/ B. Russell Horton
B. Russell Horton

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on May 26, 2021, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

Dated: May 26, 2021

/s/ B. Russell Horton
B. Russell Horton
